

EXHIBIT A

September 30, 2024

SHOOK
HARDY & BACON

BY ELECTRONIC MAIL

William A. Levin
Levin Simes LLP
1700 Montgomery St., Suite 250
San Francisco, CA 94111
wlevin@levinsimes.com

Walt Cubberly
Williams Hart Boundas, LLP
8441 Gulf Freeway, Suite 600
Houston, Texas 77017
wcubberly@whlaw.com

Steve Estey
Estey Bomberger
2869 India Street
San Diego, CA 92103
steve@estey-bomberger.com

Celine Cutter
Cutter Law P.C.
1999 Harrison Street, Suite 1400
Oakland, CA 94612
ccutter@cutterlaw.com

Sarah R. London
Lieff Cabraser Heimann &
Bernstein
275 Battery Street, Fl. 29
San Francisco, CA 94111
Slondon@lchb.com

Rachel B. Abrams
Peiffer Wolf Carr Kane Conway &
Wise, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Rabrams@peifferwolf.com

Roopal P. Luhana, Esq.
Chaffin Luhana LLP
600 Third Avenue, F. 12
New York, NY 10016
Luhana@chaffinluhana.com

2121 Avenue of the Stars
Suite 1400
Los Angeles, California 90067
t 424.285.8330
dd 424.324.3494
f 424.204.9093
mshortnacy@shb.com

***Co-Lead Counsel for MDL
Plaintiffs***

***Co-Lead Counsel for JCCP
Plaintiffs***

Re: *In Re: Uber Rideshare Cases*, JCCP No. 5188; and *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, MDL 3084

Dear Counsel:

On behalf of our clients, Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”), we are making the first rolling production of U.S. incident data fields tied to SAFE Jira tickets and Bliss communications corresponding to the 2017-2018 and 2019-2020 U.S. Safety Reports, pursuant to the Court’s Order Granting in Part and Denying in Part Joint Discovery Letter Brief Regarding Discovery Related to Safety Data and Statistics (ECF 683) and the parties’ agreement. Per agreement of the parties, this data is being made available to Plaintiffs’ Leadership and their designated

experts through BDO USA LLP, which has been engaged as a third-party to securely host the safety data and manage and control access, as agreed by the parties. Please note that all data in this production has been designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” consistent with the JCCP Protective Order entered by the Court on September 14, 2022 and the MDL Protective Order entered by the Court on December 28, 2023. The designated materials shall be handled and stored in accordance with these Orders of the Court. The parties have further agreed to restrictions on the data and its use within the secure workspace, which is memorialized separately.

September 30, 2024
Page 2

Uber reserves the right to amend, supplement, correct, or modify the information contained herein and in the associated data, if and as we obtain additional information.

Sincerely,



Michael B. Shortnacy
Partner

cc:

Robert A. Atkins
Patrick L. Oot
Bobbie E. Hooper
Kyle Smith
Jessica E. Phillips
Randall S. Luskey
Jacqueline P. Rubin
Christine M. Ray

*Counsel for Defendants
Uber Technologies, Inc., Rasier LLC, and Rasier-CA LLC*